

UNITED STATES DISTRICT COURT

for the

Southern District of Mississippi



United States of America)
v.)
EDWIN RAFAEL ULLOA-GRULLON) Case No.
a/k/a Edwin Rafael Ulloa)
)
)
)

1:24-mj- 110-BWK

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 28, 2024 in the county of Jackson in the
Southern District of MS, Southern Division, the defendant(s) violated:

Code Section	Offense Description
8 U.S.C. §§ 1326(a) and (b)(1)	Unlawful Return by an Alien Deported or Removed From the United States After Conviction of a Felony
18 U.S.C. § 1546(a)	Fraud and Misuse of Visa, Permit or Other Document
18 U.S.C. § 1028(a)(7)	Fraud in connection with Identification Documents

This criminal complaint is based on these facts:

See Affidavit, attached hereto and incorporated by reference herein.

Continued on the attached sheet.


Johnnie Cola
Complainant's signature

Complainant's signature

Tchanavian N Cola, Special Agent, DHS HSI

Printed name and title

Sworn to before me and signed in my presence.

Date: 08/29/2024


Judge's signature

City and state: Gulfport, Mississippi

Bradley W. Rath, United States Magistrate Judge

Printed name and title

AFFIDAVIT

STATE OF MISSISSIPPI)

COUNTY OF HARRISON :

SOUTHERN DISTRICT OF MISSISSIPPI)

I, Tchanavian Cola, being first duly sworn, hereby depose and say that:

1. I am a Special Agent (SA) with Homeland Security Investigations (HSI), United States Department of Homeland Security, presently assigned to the Office of the Resident Agent in Charge, Gulfport, Mississippi. I have been a Special Agent since November 2021 and am a graduate of the Federal Law Enforcement Training Center. I have received training with immigration investigations and previously lead immigration investigations involving the apprehension of immigration violators.
2. On or about August 28, 2024, in the early morning hours, a Gulfport Station Border Patrol Agent (BPA) currently working with the South Mississippi Metro Enforcement Team (SMMET) was conducting highway interdiction on Interstate 10 in Jackson County, MS. The SMMET is part of the Federal Bureau of Investigation's High Intensity Drug Trafficking Area (HIDTA) Safe Streets Task Force. The BPA also is deputized by the Federal Bureau of Investigation and by the Jackson County Sheriff's Department. The BPA and a Police Officer with the Gautier Police Department were conducting research and analyst of law enforcement databases and observing traffic near mile marker 62, westbound, on Interstate 10, near Gautier, MS. The Officer also is part of the Safe Streets Task Force.
3. The agent and officer noticed a commercial bus pass their location, driving over the white

line and decided to further investigate the vehicle based upon recent law enforcement intelligence and the witnessed action of the bus. The police officer initiated a vehicle stop at mile marker 57, westbound, near Gautier, MS. The officer and BPA asked the driver for consent for the BPA and his service canine, to conduct a free air sniff of the bus. The driver granted consent. The BPA deployed his service canine and the canine alerted to a trained odor.

4. The BPA and officer conducted a search of the area of the bus where the canine alerted and noticed a black bag. The BPA and officer began questioning the occupants of the bus as to the owner of the black bag. No one on the bus claimed ownership of the bag. The BPA and officer opened the bag and discovered bulk currency, later counted to total \$208,924.00, wrapped in rubber bands. While questioning the occupants of the bus, the BPA determined one subject was a citizen of the Dominican Republic, identified as Edwin Rafael Ulloa-Grullon.

5. Records check revealed Ulloa-Grullon to be an aggravated felon who had previously been removed from the United States on or about October 15, 2008. Further, Ulloa-Grullon was found to be in possession of what purported to be a United States social security card containing the name Carlos Ruben Gonzalez-Vazquez, as well as what purported to be a Puerto Rican Driver's License bearing the name Carlos Ruben Gonzalez-Vazquez with Ulloa-Grullon's photo, which he presented to the BPA before admitting to his rightful name and status. On-site, Ulloa-Grullon was determined to be an Alien to the U.S. who was unlawfully present in the U.S. He was arrested and later taken to the Gulfport Border Patrol Station for processing.

6. On or about August 28, 2024, HSI Special Agent (SA) Tchanavian Cola along with Border Patrol Agent (BPA) Samuel Woody and BPA Mauricio Guzman conducted an audio and video recorded interview of Edwin Ulloa-Grullon at the Border Patrol Station in Gulfport, Mississippi. The interview was conducted in English with a fluent Spanish speaking agent

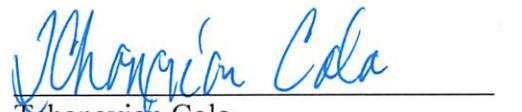
available for any translation if needed. Post-Maranda (read in Spanish, spoken in English) Edwin Ulloa-Grullon advised agents that he was previously deported and illegally returned to the United States around December of 2021, after his parole ended in 2018. Ulloa-Grullon explained he paid a total of approximately \$10,000.00 to illegally cross from Mexico into the United States via New Mexico.

7. Ulloa-Grullon told agents after entering the United States he resided in Houston and Atlanta. While in Houston, Ulloa-Grullon worked at Uber Eats, Grub Hub and Favor, utilizing a vehicle registered to a friend. When encountered, Ulloa-Grullon advised he was travelling from Atlanta to Houston. Ulloa-Grullon explained he purchased the bus ticket via online on Monday, August 26, 2024, using the name Carlos Gonzales. Ulloa-Grullon advised the Social Security Administration (SSA) Card and the Puerto Rican Driver's License found in his possession were purchased at a flea market in Houston and he uses the cards to obtain work. Investigation determined that the Social Security Number and name used by the defendant belonged to another person other than defendant. A Social Security Card is authorized by federal statute to show that the lawful holder is authorized to work in the U.S. Ulloa-Grullon was in unlawful possession of this document that purported to be a SSA Card. Ulloa-Grullon knew he possessed these documents unlawfully and purposefully used the name and social security number of another person instead of trying to work under his own name because he knew he could not work lawfully.

8. Investigation also revealed that Ulloa-Grullon had been previously convicted of a felony offense involving controlled substance trafficking in or about 2006. After serving his prison sentence, Ulloa-Grullon was lawfully removed from the U.S.

9. Ulloa-Grullon admitted to unlawfully returning to the U.S. after his removal. Finally, record checks reveal that he had not received consent or permission from the U.S. Attorney General or the Secretary of Homeland Security to apply for readmission or to reenter the United States.

10. Based on the aforementioned facts, your affiant believes there is probable cause that Edwin Ulloa-Grullon is in violation of 18 United States Code Section 1546 (a), Fraud and misuse of visas, permits, and other documents, 18 United States Code Section 1028 (a)(7), Possession of an identifier/authentication feature of another person in connection with a violation of federal law, and 8 United States Code Section 1326 (a) and (b)(1) unlawful return to the United States by an alien deported or removed after conviction of a felony.



Tchanavian Cola
Special Agent
Homeland Security Investigations
U.S. Department of Homeland Security

Sworn to and subscribed before me this,

the 29th day of August 2024.



Honorable Judge Bradley W. Rath
United States Magistrate Judge
Southern District of Mississippi